

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KAELI GARNER, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
Corporation, and AMAZON.COM SERVICES  
LLC, a Delaware Limited Liability Company,

Defendants.

Case No. 2:21-cv-00750-RSL

**DECLARATION OF MELISSA LAWTON  
IN SUPPORT OF DEFENDANT  
AMAZON'S REPLY BRIEF IN SUPPORT  
OF MOTION FOR PROTECTIVE  
ORDER PRECLUDING THE  
DEPOSITION OF ITS SENIOR VICE  
PRESIDENT OF DEVICES AND  
SERVICES**

NOTE ON MOTION CALENDAR:  
September 8, 2023

I, Melissa Lawton, hereby declare as follows:

1. I am an attorney admitted *pro hac vice* in this action and am counsel at the law firm of Fenwick & West LLP, counsel of record for Defendants Amazon.com, Inc. and Amazon.com Services, LLC (“Amazon”). I have personal knowledge of the facts set forth in this declaration. If called upon to do so, I could competently testify to those facts.

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the transcript of the August 23, 2023 deposition of Angela Sun.

3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the transcript of the August 31, 2023 deposition of Shiv Vitaladevuni.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Los Angeles, California on September 8, 2023

/s/ Melissa Lawton  
Melissa Lawton